

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LESLIE DICK WORLDWIDE, LTD. and LESLIE
DICK,

Plaintiffs,

-against-

GEORGE SOROS, SOROS FUND MANAGEMENT,
LLC, SFM MANAGEMENT, LLC, CONSECO,
INC., VORNADO REALTY TRUST, GERMAN
AMERICAN CAPITAL, CORP., DEUTSCHE
BANK, A.G., EASTDIL SECURED, LLC, HARRY
MACKLOWE, FIG, LLC, CERBERUS CAPITAL
MANAGEMENT, LP, LAZARD FRERES & CO.,
LLC, KIRKLAND & ELLIS, LLP, FRIED, FRANK,
HARRIS, SHRIVER & JACOBSON LLP, CARMEL
FIFTH, LLC, 767 MANAGER, LLC, DONALD J.
TRUMP and John Does "1" through "10",

Defendants.
-----X

ELECTONICALLY FILED

ECF CASE
Civil Action No. 08 CV 7900
(BSJ)(THK)

**AFFIDAVIT OF ROBERT
J. HANTMAN, ESQ. IN
SUPPORT OF
PLAINTIFFS' MOTION
TO DISQUALIFY
PHILLIPS NIZER, LLP
FROM REPRESENTING
DONALD J. TRUMP
AND 767 MANAGER, LLC**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK

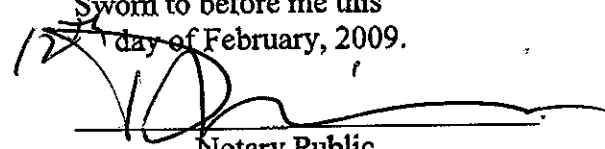
ROBERT J. HANTMAN, being duly sworn, deposes and says:

1. I am the principal of Hantman & Associates, the firm which represented Mr.
Leslie Dick and Leslie Dick Worldwide, Ltd. (collectively, "Leslie Dick") before
the New York State Supreme Court, Appellate Division First Department: Index
No. 600222/06.
2. It is not my purpose to become embroiled in the disqualification issues before this
Court, as I respect the Phillips Nizer LLP firm ("Phillips Nizer") and have worked
with them in the past and we even have mutual clients.

3. In retrospect, however, I am surprised that a "conflict of interest waiver" was not entered into as that would clearly have avoided the instant unpleasant situation for both plaintiffs and the Phillip Nizer law firm.
4. This affidavit is limited, as it should be, to my rather brief professional dealings with Phillips Nizer as it related to Leslie Dick and his company, Leslie Dick Worldwide, Ltd.
5. In preparation for oral argument before the Appellate Division – First Department, I had the pleasure and honor of meeting and conferring with Judge Lerner, a former Appellate Division Justice and Counsel of Phillips Nizer for the purpose of bolstering and fine tuning my oral argument.
6. I met with Judge Lerner approximately three (3) times.
7. In addition, I attended a meeting at Phillips Nizer with a number of the firm's partners in attendance, in which Mr. Leslie Dick was presented with a worksheet indicating an outstanding balance owed to Phillips Nizer in the amount of \$13,000, for work prior to my or Mr. Dick's meetings with Judge Lerner.
8. Clearly, as the time I spent with Judge Lerner was important yet minimal, Mr. Dick met with members of Phillips Nizer well beyond the scope of critiquing my oral argument before the Appellate Division First Department.


Robert J. Hantman, Esq.

Sworn to before me this
12th day of February, 2009.


Notary Public
DAVID H. RELKIN
Notary Public, State of New York
No. 02RE4905662
Qualified in New York County
Commission Expires August 24, 2009